

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

JANA REED, INDIVIDUALLY AND AS
REPRESENTATIVE OF THE ESTATE OF
CHRISTOPHER REED AND ON BEHALF OF
A.R. (A MINOR); LOGAN REED, AND
CHASE REED

Plaintiffs

V.

MAERSK LINE-LTD, USA AND
MAERSK LINE, LIMITED

In Personam Defendants;

M/V MAERSK IDAHO

In Rem defendant.

C.A. NO. 3:19-cv-00238

9(H) Admiralty

MAERSK LINE, LIMITED'S (as in personam Defendant and as owner of the in rem Defendant M/V Maersk Idaho)

SUPPLEMENTAL RULE 26 EXPERT DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Maersk Line, Limited, as *in personam* Defendant, and as the owner of the *M/V Maersk Idaho*, *in rem* Defendant, (hereinafter collectively referred to as "MLL" or "Maersk"), serves its Supplemental Expert Disclosure pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure. This Expert Disclosure supplements Maersk's Rule 26 Expert Disclosure made on August 17, 2020 (Dkt. No. 68) and is in accordance with the Order Amending Scheduling Order (Dkt. No. 52).

A. Disclosure of Retained Experts:

1. Dick K.P. Yue
Yuming Liu
Center for Ocean Engineering
Department of Mechanical Engineering
Massachusetts Institute of Technology
Cambridge, MA 02139
(617) 253-6823

Dr. Yue and Dr. Liu are experts in naval architecture, marine fluid mechanics, ocean engineering and theoretical and computational wave hydrodynamics. Dr. Yue will provide testimony regarding the wake dynamics generated by the *Maersk Idaho* on June 7, 2019 in Galveston Bay. He will testify as to the properties of the wake generated by the *Maersk Idaho* and any other opinion contained in the report accompanied with this Disclosure. Dr. Yue will be the defendants' designated testifying expert on these subjects. Dr. Liu participated with Dr. Yue in the analysis described in the expert report co-authored by Dr. Liu and Dr. Yue. Their opinions are based on their education, training, and experience, as well as their review of documents/data in this case. A summary of Dr. Yue's and Dr. Liu's education, training, and experience can be found in the attached curriculum vitae.

Maersk's previously filed disclosure and designation of expert witnesses, Dkt. No. 68, remains in place. Maersk reserves the right to elicit, by way of direct or cross-examination, testimony from those individuals identified as experts by Plaintiffs. Maersk also reserves the right to elicit opinion testimony from lay witnesses as permitted by Fed. R. Evid. 701. Maersk reserves the right to have an expert witness supplement his report based on additional information received after their initial reports have been served.

Respectfully submitted,

HOLMAN FENWICK WILLAN USA LLP

/s/ Alejandro Mendez-Roman

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ATTORNEY-IN-CHARGE FOR
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 1st day of December, 2020 to all counsel of record via electronic mail:

/s/ Alejandro Mendez-Roman

Alejandro Mendez-Roman